

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

IN RE:

Reagor-Dykes Motors, LP,
Reagor-Dykes Imports, LP,
Reagor-Dykes Amarillo, LP,
Reagor-Dykes Auto Company, LP,
Reagor-Dykes Plainview, LP, and
Reagor-Dykes Floydada, LP,
Reagor Auto Mall, Ltd.,
Reagor-Dykes Snyder, L.P.,
Reagor-Dykes Auto Mall I LLC,
Reagor-Dykes II LLC,
Reagor-Dykes III LLC,

Case No. 18-50214-rlj-11
Jointly Administered

Debtors,

Dennis Faulkner, Creditors' Trustee,

Plaintiff,

Adversary No. 20-05005-rlj

vs.

Ford Motor Credit Company LLC,

Defendant.

**DEFENDANT FORD MOTOR CREDIT COMPANY LLC'S
MOTION TO PRECLUDE WILLIAM C. PLOOG**

Defendant Ford Motor Credit Company LLC ("Ford Credit") hereby files its Motion to Preclude William C. Ploog, a retained expert disclosed by Plaintiff Creditors' Trustee Dennis Faulkner (the "Trustee"), from offering expert testimony or opinion at trial in the above-captioned adversary proceeding pursuant to Federal Rule of Evidence 702. Ford Credit's Motion

to Preclude William C. Ploog (the “Motion”) should be granted in its entirety for the reasons set forth in Ford Credit’s Brief in Support of the Motion.

Ford Credit relies on the evidence included in its Appendix in Support of the Motion and any docket entries cited in its Brief in Support of the Motion. Ford Credit respectfully requests a hearing on its Motion.

PRAYER

Ford Credit requests that the Court grant the Motion in its entirety and issue an Order: (1) precluding William C. Ploog from offering any expert testimony or opinion at trial in the above-captioned adversary proceeding; and (2) granting such other and further relief to which Ford Credit may be justly entitled.

Dated: March 14, 2022

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

Kevin M. Sadler, Esq.
1001 Page Mill Road
Building One, Suite 200
Palo Alto, CA 943304
(650) 739-7518 – Telephone
(650) 739-7618 – Facsimile
kevin.sadler@bakerbotts.com

Michael S. Goldberg, Esq.
910 Louisiana Street
Houston, TX 77002-4995
(713) 229-1401 – Telephone
(713) 229-2801 – Facsimile
michael.goldberg@bakerbotts.com

PHILLIPS LYTLE LLP

Craig A. Leslie, Esq.
Jacob S. Sonner, Esq.
Admitted Pro Hac Vice
One Canalside
125 Main Street
Buffalo, NY 14203
(716) 847-8400 – Telephone
(716) 852-6100 – Facsimile
cleslie@phillipslytle.com
jsonner@phillipslytle.com

*ATTORNEYS FOR DEFENDANT
FORD MOTOR CREDIT COMPANY LLC*

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2022, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to all parties through the Court's Electronic Case Filing System ("ECF"). Parties may access this filing through ECF.

/s/ Kevin M. Sadler

Kevin M. Sadler